MEMO ENDORSED

USDC SDNY
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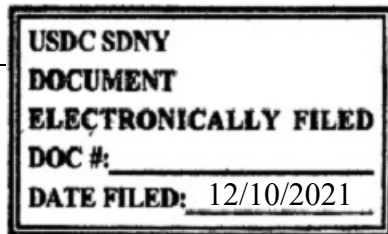ELECTRONICALLY FILED
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DATE FILED:__12/10/2021__

U.S. Department of Justice

United States Attorney
Southern District of New York

86 Chambers Street
New York, New York 10007

December 9, 2021

By ECF

The Honorable Barbara Moses
United States Magistrate Judge
Daniel Patrick Moynihan United States Courthouse
500 Pearl St.
New York, NY 10007-1312

      Re: *Project South et al. v. U.S. Immigration and Customs Enforcement et al.*, 21 Civ.
             8440 (ALC) (BCM)

Dear Judge Moses:

      This Office represents U.S. Immigration and Customs Enforcement, the U.S. Department
of Homeland Security, U.S. Citizenship and Immigration Services, the U.S. Department of
Justice Executive Office for Immigration Review, and the U.S. Department of State (collectively,
the "Government"), the defendants in the above-referenced case filed under the Freedom of
Information Act, 5 U.S.C. §§ 552 *et seq*. I write respectfully to request an adjournment of the
initial conference currently scheduled for January 4, 2022, at 11:00 a.m.

      I will be departing the U.S. Attorney's Office next week, and the second Assistant U.S.
Attorney assigned to this case is out on parental leave until early January. Accordingly, we
respectfully request a 30-day adjournment of the initial conference, from January 4, 2022, to
February 3, 2022, or to any day thereafter convenient for the Court. Plaintiffs consent to this
request.

      We thank the Court for its consideration.

Application **GRANTED**. The initial case management
conference scheduled for January 4, 2022 (Dkt. No. 23)
is adjourned to **February 3, 2022** at **11 a.m.**, in
Courtroom 20A, 500 Pearl Street, New York, New
York.

SO ORDERED.

_____
BARBARA MOSES
United States Magistrate Judge
December 10, 2021

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney

By: _/s/ Talia Kraemer_____
    TALIA KRAEMER
    LUCAS ISSACHAROFF
    Assistant United States Attorneys
    Tel.:   212-637-2822/2737
    Fax: 212-637-2702
    E-mail: talia.kraemer@usdoj.gov
              lucas.issacharoff@usdoj.gov

cc: Counsel of Record
       By ECF